

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO: 24-CR-20295-JB

Plaintiff,

vs.

BRYAN TOCHON-LOPEZ,  
WILMER MOISES BARSELO,  
JOSE FELICIANO LEMOS,  
JESUS RODRIGUEZ,  
LUIS ANDRES ZUNIAGA,  
JORGE LUIS LOPEZ-ASTUDILLO,  
EULIDES OLIVEROS-LUGO,  
STIVEN JOSE FLORES

Defendants.

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**UNOPPOSED JOINT MOTION FOR CONTINUANCE OF TRIAL**

Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO, and STIVEN JOSE FLORES**, by and through their counsel, and in accordance with *18 U.S.C. §3161(h)(7)* and *S.D. Fla. L.R. 7.6*, hereby file this Unopposed Joint Motion for Continuance of the currently set trial date. As grounds in support of this request, the Defendants state:

1. On or about June 26, 2024, the Defendants were arrested after being intercepted upon the high seas and elsewhere outside the jurisdiction of any particular State or district.
2. On July 11<sup>th</sup>, 2024, the Government filed an indictment charging the Defendants with Conspiracy to Possess with Intent to Distribute a Controlled Substance While On Board a Vessel



Subject to the Jurisdiction of the United States (Count 1) and Possession with Intent to Distribute a Controlled Substance While On Board a Vessel Subject to the Jurisdiction of the United States.

3. On July 22<sup>nd</sup>, 2024, the Defendants were arraigned in this matter [DE 15, 16, 17, 18, 19, 20, 21, 22].

4. On or about July 22, 2024, the Government provided discovery to Defendants.

5. On February 12, 2025, Defendants filed their Joint Motion to Dismiss. [DE 71]. On or about February 26<sup>th</sup>, 2025, the Government filed its Response to the Defendants' Joint Motion to Dismiss. [DE 77]. On or about March 5<sup>th</sup>, 2025, the Defendants filed their Reply to the Government's Response. [DE 82].

6. On or about February 25<sup>th</sup>, 2025, this Honorable Court referred the Defendants' Joint Motion to Dismiss to the Honorable Magistrate Edwin G. Torres. [DE 76]. On April 4<sup>th</sup>, 2025, Magistrate Torres entered a Report and Recommendation recommending that the Defendants' Joint Motion to Dismiss be denied. [DE 86]. On April 18<sup>th</sup>, the Defendants filed Joint Objections to the Report and Recommendation filed by Magistrate Torres. [DE 89].

7. A jury trial on this matter is currently set for the two-week period commencing June 2, 2025, with a Calendar Call scheduled for May 27<sup>th</sup>, 2025. [DE 92].

8. Defendants request a continuance of the trial date until after the Defendants' Joint Motion to Dismiss and their Objections to the Magistrate's Report and Recommendation has been finally disposed of.

9. Additionally, counsel for Defendant Tochon advised that she will be out of the country from May 24 through June 8th on a prepaid vacation.



10. This Motion is being filed in good faith, in the interests of judicial economy to afford the Parties the proper opportunity to resolve this matter without the need for a trial, and in furtherance of providing Defendants effective assistance of counsel. This Motion is not being filed for purposes of undue delay.

**CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9**

On May 15<sup>th</sup>, 2025, the undersigned conferred with AUSA Yvonne Rodriguez-Shack who advised that the Government does not object to the Court granting this Motion for Continuance. Additionally, after conferral with counsel for the codefendants, the codefendants join in the motion.

**WHEREFORE**, Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO, and STIVEN JOSE FLORES**, respectfully pray that this Honorable Court grant the Defendants' Joint Motion for Continuance of trial, enter an Order continuing this case to, at least, a date in July 2025, so that the Defendants' Joint Motion to Dismiss and their Objections to the Magistrate's Report and Recommendation are finally disposed of, and for any other relief the Court deems proper and just under the circumstances.

Respectfully submitted,



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| <p><b>QUINTERO BROCHE, P.A.</b><br/> <i>Attorney for Jorge Luis Lopez-Astudillo</i></p> <p>BY: <u>/s/ Frank Quintero, Jr.</u><br/>     FRANK QUINTERO, JR.<br/>     Florida Bar No.: 399167<br/>     75 Valencia Ave., Suite 800<br/>     Coral Gables, Florida 33134<br/>     Tel.: 305-446-0303/Fax: 305-446-4503<br/>     E-mail:<br/>     fquintero@quinterolaw.net<br/>     eservice@quinterolaw.net</p> | <p><b>FEDERAL PUBLIC DEFENDER</b><br/> <i>Attorney for Brayan Tochon-Lopez</i></p> <p>BY: <u>/s/Srilekha Jayanthi</u><br/>     Srilekha Jayanthi<br/>     Assistant Federal Public Defender<br/>     150 W. Flagler Street, Suite 1700<br/>     Miami, Florida 33130<br/>     Tel: (305) 530-7000<br/>     Email: srilekha_jayanthi@fd.org</p>                                      |
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| <p><b>ROGER CABRERA, PA</b><br/> <i>Attorney for Jesus Rodriguez</i></p> <p>BY: <u>/s/Roger DE Jesus Cabrera</u><br/>     Roger DE Jesus Cabrera<br/>     Florida Bar No.: 148740<br/>     333 SE 2nd Avenue, Suite 2000<br/>     Miami, Florida 33131<br/>     Tel: (305) 823-8383<br/>     Fax: (305) 675-7970<br/>     Email: Roger@Cabrera.legal</p>  | <p><b>LAW OFFICES OF JOSEPH A. CHAMBROT</b><br/> <i>Attorney for Luis Andres Zuniaga</i></p> <p>BY: <u>/s/Joseph Abraham Chambrot</u><br/>     Joseph Abraham Chambrot<br/>     Florida Bar No.: 434566<br/>     1885 NW North River Drive<br/>     Miami, Florida 33125<br/>     Tel: (305) 547-2101<br/>     Fax: (305) 547-2107<br/>     Email: joseph@chambrotlaw.com</p>       |



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| <p><b>BATISTA &amp; BATISTA</b><br/>Attorney for <i>Eulides Oliveros-Lugo</i></p> <p>BY: <u>/s/Jose Rafael Esteban Batista</u><br/>Jose Rafael Esteban Batista<br/>Florida Bar No.: 317251<br/>7171 Coral Way, Suite 400<br/>Miami, Florida 33155<br/>Tel: (305) 267-5139<br/>Fax: (305) 267-4108<br/>Email: jrebatistalaw@gmail.com</p> | <p><b>CARAMES LAW</b><br/>Attorney for <i>Stiven Jose Flores</i></p> <p>BY: <u>/s/Dianne Elizabeth Carames</u><br/>Dianne Elizabeth Carames<br/>Florida Bar No.: 68419<br/>10 Canal Street, Suite 328<br/>Miami Springs, Florida 33136<br/>Tel: (305) 403-8063<br/>Fax (305) 379-6668<br/>Email: dianne@puglisicarames.com</p> |
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the above and foregoing was electronically filed via *CM/ECF* this 16th day of May 2025, and a courtesy copy of the foregoing furnished via email to all counsel of record.

Respectfully submitted,

**QUINTERO BROCHE, P.A.**  
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